



Public Works and Natural Resources  
Environmental Services  
**Industrial Pretreatment Program**

## Toxic Organic Management Plan (TOMP)

Per 40 CFR 403.3 (e), **Best Management Practices (BMPs)** are schedules of activities, prohibitions of practices, maintenance procedures and other management practices. BMPs also include treatment requirements, operating procedures, and practices to control plant site run off, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Certain categorical industrial users (CIUs) that must meet categorical pretreatment standards for toxic organics may have the option to submit a **Toxic Organic Management Plan (TOMP)** in lieu of costly routine.

The CIU analyses the discharge for the toxic organics listed in the appropriate categorical standards. This is reported on the baseline monitoring report. The CIU may then request that a TOMP and certification be used in lieu of routine monitoring. Once the submitted TOMP is approved by the City, CIUs are required to certify on the self monitoring report that no toxic organics can enter the sanitary sewer.

Under section 14.08.350 of the Longmont Municipal Code, the Industrial Pretreatment Program requires all Permittees to develop and submit a **Waste Management Plan (WMP)**. The TOMP may be part of your WMP. TOMPs may also be called **Solvent Management Plans**. The City may also request a TOMP for zero discharge permits.

The existence of a management plan does not relieve the discharger from fines, civil penalties or other liabilities which may be imposed in the event of violations of the code or other applicable ordinances or laws.

Best Management Practices are local limits. TOMP's are best management practices and are incorporated into the permit.

Failure to meet the requirements outlined in the approved TOMP is a violation.

### **Minimum requirements of TOMP:**

1. List of the toxic organic compounds used.
2. Method of disposal used (discharge to sewer is not an approved method). For example: reclamation/recycling, hauling off site, incineration.
3. Procedures that ensure that the toxic organics do not routinely spill or leak in the wastewater.

Upon submission and approval of a TOMP, it will be incorporated into the permit under section I. B. and II. A. and evaluated during the annual inspection.

Any changes to the TOMP must be submitted to the City for approval 30 days prior to enacting the changes.

Under 40 CFR 403.8 (f) (2) (vii) (H), any violation or group of violations, which may include violations of BMPs, that the City determines will adversely affect the operation or implementation of the Industrial Pretreatment Program is a significant noncompliance (SNC).

## **Example Outline for WMP that includes a TOMP**

### **Title Page**

Business Name and Address

Title: "Waste Management Plan" or "Slug Control Plan" or "Spill Plan"  
*And "Toxic Management Plan" or "Solvent Management Plan"*

Date and any revision dates

### **Introduction**

#### **Disposal Practices**

A description of the discharge practices, including non-routine batch discharges.

*Method used specifically for disposal of toxic organics such as reclamation/recycling, off site disposal or incineration*

A description of any measures used to prevent discharge to sanitary sewers or storm drains:

- preventative maintenance procedures,
- maintenance of backup equipment to mitigate equipment failures,
- maintaining adequate staff levels for proper operation, and
- prompt management and operational response to emergency situations as well as long-term compliance deadlines;
- *procedures that ensure that the toxic organics do not routinely spill or leak in the wastewater.*

#### **Training**

A description of the training procedures and training frequencies for personnel involved in handling, storing and disposing of toxic or hazardous pollutants, if any.

#### **Chemical Storage and Handling**

Complete inventory including identities and approximate quantities of chemicals. *This must include any toxic organics listed in the categorical pretreatment standards.*

Identification of potential discharges: from any regulated manufacturing process or during chemical handling/transport

A description of spill containment, treatment and disposal methods of pollutants and chemicals used or stored.

#### **Spill Response**

An outline of the spill-prevention procedures.

A list or outline of the emergency response and notification procedures to be followed in case of accidental spills. Notification procedures must include immediate notification to the City of Longmont Industrial Pretreatment Program of any slug discharge with a follow-up written notification within five days of the incident.

IP Program (303) 651-8667  
WWTP (303) 651-8382  
501 East 1st Avenue  
Longmont, CO 80501

#### **Attachments**

MSDS for all chemicals.

Diagram of the facility indicating the process and storage locations, the locations of any floor drains, the locations of any storm drain inlets within 50 feet of the property.

### **Certification Statement to be included on each self monitoring report**

"Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation [or pretreatment standard] for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the City of Longmont. "

If the user is unable to make the above certification statement, the user should notify the City sixty (60) days prior to the Discharge Monitoring Report due date. At that time, the City will determine the appropriateness of requiring sampling and analysis for specific toxicants.